

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THOMAS E. GUPTON)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2010-00045
TODD COUNTY WATER DISTRICT)	
)	
DEFENDANT)	

DATA REQUEST OF COMMISSION STAFF
TO TODD COUNTY WATER DISTRICT

Todd County Water District ("Todd Water"), pursuant to 807 KAR 5:001, is to file with the Commission the original and three copies of the following information, with a copy to all parties of record. The information requested herein is due on or before May 18, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Todd Water shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Todd Water fails or refuses to furnish all or part of the requested information, Todd Water shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

All social security numbers, tax identification numbers, financial account numbers, and any dates of birth and e-mail addresses of individuals should be redacted from material to be filed herein. Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Todd Water is to file copies of all documents that are related to the service or new tap-on service for Thomas E. Gupton, including, but not limited to:
 - a. Customer's service agreement; and
 - b. Utility's work order to install/provide water service, including the date the meter box/vault was installed and the date the meter was installed.
2. Did the meter show any usage when it was set? If so, why?
3. Why did the utility request the customer's plumbing permit?
4. Todd Water has referenced a signed Agreement which refers to a meter base being set. File a copy of this Agreement.

5. Is the Agreement referenced in Item 4 above the same agreement referenced in Tariff Sheet No. 3, #4, Application for Service, in Todd Water's tariff?

- a. If no, what is the difference?
- b. Provide a copy of the form agreement.

6. Todd Water's Tariff Sheet No. 5 at #10, Billing, states, "On a new tap-on, the billing for this new service shall begin at the time the District makes water available to the customer, regardless of whether the consumer is connected to the meter." This provision seems to imply that a meter is set at the tap-on and, once the meter is in place, "water is available" and the billing commences whether or not the consumer connects to the meter. Todd Water's Answer states, "From the time the meter box is installed, a minimum billing statement for the water available to the customer is made."

- a. What is the utility's definition of when "water is available" for billing purposes?
- b. Does the term "meter box" appear in Todd Water's tariff? If not, where does it appear?

7. Was the water bill mailed to an address different than that given in the Agreement? If so, why?



Jeff Detouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: MAY - 6 2010

cc: Parties of Record

Dr. George Brown
Chairman
Todd County Water District
P. O. Box 520
617 West Main Street
Elkton, KY 42220

Thomas Gupton
915 Dumas Dr.
Clarksville, TN 37040